

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

JOSÉ L. Hernández - ComPres
Plaintiff

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CLERK'S OFFICE
U.S. DISTRICT COURT
SAN JUAN, P.R.
Case No. 19-CV-1795 (JAG)

Vs.

ESTADO LIBRE ASOCIADO, et al.
Defendants

STAY RELIEF MOTION

TO THE HONORABLE COURT:

Comes now before the Honorable Court the above named Plaintiff, who respectfully states and prays:

1- Previously we presented a URGENT STAY MOTION in which we requested and established our legal arguments to which we based our petition.

2- On August 25th 2019, the Defendants — submitted a cross motion to persuade the Honorable Court that our request was not based on the foundations of III Paragraph of the Case Management Procedures. Before presenting this "STAY RELIEF MOTION". And the extraordinary circumstances on which is based.

3- ESTABLISHING THAT OUR POSITION IS BASED ON THE FACT THAT THE PLAINTIFF IS SUFFERING PHYSICAL DAMAGES, TO WHICH HE HAD TO BE INTERVIEWED BY SURGICAL PROCEDURE ON MARCH 2019.

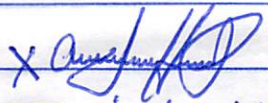
4- WE RESPECTFULLY REQUEST THE COURT TO ISSUE AN ORDER TO OBTAIN ALL EXISTING MEDICAL FILES UNDER THE PUERTO RICO STATE INSURANCE. ALL THAT PROVES THAT THE DAMAGES RELIEF ACTION, IS BASES ON PHYSICAL PERMANENT DAMAGES.

5- WE UNDERSTAND THAT BASED ON THESE — ARGUMENTS WE COMPLY WITH "THE EXTRAORDINARY CIRCUMSTANCES" REQUIRED BY THE PARAGRAPH III, OF THE CASE MANAGEMENT PROCEDURES.

6- THAT BEING STATED, WE RESPECTFULLY REQUES OF THE HONORABLE COURT THE following:

- a) GRANT THE STAY RELIEF MOTION.
- b) ORDER THAT A COUNSELOR BE A APPOINTED.
- c) GRANT IN ALL IS CONTENT THAT THE RELIEF MOTION, (LAW SUIT) BE PAID IN FULL.

RESPECTFULLY SUBMITTED,
ON THIS 9th day of SEPTEMBER, 2019

X 

JOSÉ L. HERNÁNDEZ - COMPRES

ANNEX 292, 50 CARR. 700-60-7073

BAYAMÓN, PR. 00961-7405